

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

LYNN GREYGOR, ADMINISTRATOR
OF THE ESTATE OF DEREK T.
GUIDOS,

CIVIL ACTION NO. 2:14-CV-01254-NBF

Plaintiff,

v.

WEXFORD HEALTH SOURCES, INC.,
BUTLER HEALTH SYSTEM, INC., BUTLER
HEALTHCARE PROVIDERS t/d/b/a BUTLER
MEMORIAL HOSPITAL, BUTLER COUNTY,

JURY TRIAL DEMANDED.

Defendants.

**MOTION OF DEFENDANT WEXFORD HEALTH SOURCES, INC. FOR SUMMARY
JUDGMENT**

AND NOW comes Defendant, WEXFORD HEALTH SOURCES, INC., by and through counsel Murphy Taylor, L.L.C., presents this MOTION FOR SUMMARY JUDGMENT with respect to Count IV of the Amended Complaint (Violation of Civil Rights), pursuant to F.R.C.P. 56. Plaintiff is unable to establish the required proof for a civil rights violation, as set for in Count IV and as required by the case law. Further support for the Defendant's right to summary judgment is set forth and can be found in the following documents, which are also being filed by the Defendant and are incorporated here by reference:

1. Wexford Health's Concise Statement of Matters not in Dispute;
2. A memorandum of law in support of this Motion for Summary Judgment; and
3. The Defendant's Appendix.

WHEREFORE, Defendant, Wexford Health Sources, Inc, respectfully requests that this Motion for Summary Judgment be granted, and that Count IV against Wexford Health (Violation of Civil Rights) be dismissed.

Respectfully submitted,

Murphy Taylor, L.L.C.

s/ Arthur J. Murphy, Jr.
Arthur J. Murphy, Jr., Esquire
Pa. I.D. #16412

s/Peter J. Taylor
Peter J. Taylor, Esquire
Pa. I.D. #26506

Murphy Taylor, LLC
326 Third Avenue
Pittsburgh, PA 15222
(412) 255-0200
murphytaylorllc@verizon.net
Firm ID #625

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing **MOTION FOR SUMMARY JUDGMENT** was electronically served on this 4th day of December, 2015, upon the following attorneys of record as follows:

Joshua P. Geist, Esquire
Goodrich & Geist, P.C.
3634 California Avenue
Pittsburgh, PA 15212
josh@goodrichandgeist.com

Michael R. Lettrich, Esquire
Marie Milie Jones, Esquire
Gulf Tower, Suite 3510
707 Grant Street
Pittsburgh, PA 15219
mlettrich@jonespassodelis.com

James W. Kraus, Esquire
Pietragallo Gordon Alfano Bosick & Raspanti
38th Floor
One Oxford Center
Pittsburgh, PA 15219
jwk@pietragallo.com

MURPHY TAYLOR, LLC.

s/Peter J. Taylor
Peter J. Taylor, Esquire